

“APPROVED”

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of the Supervisory Board of the

CO “CF “ADRA UKRAINE”

dated 5th of June 2025



**Safeguarding Policy of
CO “CF “ADRA Ukraine”**

Kyiv, 2025

Introduction

In accordance with the values and principles of the CO “CF “ADRA Ukraine”, we strive to build an agency that demonstrates God’s love and compassion. Our ability to achieve this is deeply connected to the people who represent the CO “CF “ADRA Ukraine”. Therefore, it is important that everyone who works with the CO “CF “ADRA Ukraine” upholds and promotes the highest level of ethical behaviour, acting with integrity and respect for others without discrimination.

The CO “CF “ADRA Ukraine” is guided by the following values:

- **Compassion** — assistance must be grounded in compassion for any difficult circumstances a person may be facing.
- **Respect** — respect for the rights, dignity, and uniqueness of every individual.
- **Integrity and Transparency** — all activities aimed at protecting individuals must be carried out in an open and honest manner.
- **Safeguarding** — commitment to creating a safe environment where all forms of abuse and violence are strictly prohibited.

Purpose

The CO “CF “ADRA Ukraine” recognises that exploitation and abuse are widespread throughout the world and in all societies. Individuals may be more vulnerable or at risk of harm due to their gender, age, ethnicity, political affiliation, religious beliefs, sexual orientation, or physical abilities. As a development and humanitarian aid agency supported by the Seventh-day Adventist Church, the CO “CF “ADRA Ukraine” is committed to ensuring that everyone who comes into contact with the organisation is treated with respect and dignity, regardless of their background or differences. This Safeguarding Policy outlines the commitment of the CO “CF “ADRA Ukraine” to protect its representatives and the population it supports. This Policy will help uphold the mission of the CO “CF “ADRA Ukraine” to “serve humanity so all may live as God intended,” and should be integrated across all CO “CF “ADRA Ukraine” offices into policies, practices, and programmes, and effectively communicated to all people.

This Policy does not cover cases of fraud, complaints and feedback mechanisms at the project level, or security issues committed by someone who does not represent the CO “CF “ADRA Ukraine”.

The purpose of this document is to outline the Safeguarding Policy of the CO “CF “ADRA Ukraine” and to provide guidance and direction to its personnel and representatives on ensuring safeguarding, including policies on child protection, protection from sexual exploitation and abuse (PSEA), protection of adults at risk, and counter-trafficking in persons (CTiP). The Safeguarding Policy will be widely disseminated to promote broad understanding and acceptance of the specific safeguarding policies and guidelines of the CO “CF “ADRA Ukraine”, and to reinforce the importance of safeguarding for our personnel and all representatives, including the obligation to report concerns regarding safeguarding violations.

The Safeguarding Policy is closely linked to the following organisational policies, which should be taken into account when applying this Policy:

- ✓ Code of Conduct;
- ✓ Policy on Prevention of Conflicts of Interest and Protection of Whistleblowers;
- ✓ Policy on Protection from Sexual Harassment, Bullying, and Misconduct in the Workplace;
- ✓ Whistleblowing
- ✓ Policy

This document revokes and replaces all previous safeguarding policies issued or used by the CO “CF “ADRA Ukraine” prior to the above-mentioned effective date.

1. Scope of Application

The Policy applies to:

- All permanent, temporary and part-time employees; board members; interns; volunteers; visitors to the CO “CF “ADRA Ukraine” (including media representatives); contractors (including suppliers and vendors) and consultants;
- All partners and organisations implementing programmes of the CO “CF “ADRA Ukraine” on the territory of Ukraine and abroad.

Representatives of the CO “CF “ADRA Ukraine” represent the organisation on a permanent basis. Unacceptable behaviour, both during and after working hours, undermines the work and values of the CO “CF “ADRA Ukraine”. Therefore, the Safeguarding Policy applies to all Representatives of the CO “CF “ADRA Ukraine” both in the work environment and outside it, during working and non-working hours, every day of the year. Being associated with the CO “CF “ADRA Ukraine” means adhering to its standards, even when those standards exceed those commonly accepted in the local context or those required by applicable legislation.

2. Context of Application

The Policy applies to all activities, including:

- Humanitarian aid projects;
- Children and youth development programmes;
- Provision of services such as education, healthcare, psychological support and more;
- All other types of activities

3. Terminology

A full list of definitions and terminology related to safeguarding is provided in Annex 1. The following definitions of key terms are provided to ensure clarity, consistency and understanding when reviewing and applying this Policy:

- **Safeguarding:** the responsibility of an organisation to ensure that its personnel, activities and programmes do not harm the people with whom they work, with particular attention to those who may be most vulnerable to exploitation and/or abuse.
- **Protection:** all measures aimed at ensuring full respect for human rights in accordance with the spirit and letter of the relevant body of legal norms, including international humanitarian law and refugee law.
- **Child:** any person under the age of 18, regardless of local customs or the age of majority or age of consent at the local level.
- **Violence:** improper treatment of a person that causes harm or injury. There are several forms of violence (physical, verbal, sexual, emotional, etc.), any or all of which can be committed as a result of intent, negligence, recklessness or ignorance.
- **Exploitation:** the use of one's position, power, influence, or control to pressure, coerce, or manipulate a person into acting against their will or against their interests and well-being, including threats to withhold assistance, threats to make false statements about the person, or other negative consequences in the workplace or community—typically for the benefit, gratification, or advantage of another person.
- **Neglect:** persistent failure to meet the basic physical and/or psychological needs of a person, which can lead to a serious deterioration in the health or development of such a person.
- **Human Trafficking:** the recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to obtain the consent of a person having control over another person, for the purpose of exploitation.

4. Guidelines

The approach of the CO “CF “ADRA Ukraine” to safeguarding has been developed on the basis of the following principles and standards of international best practice, which have been duly incorporated into the Safeguarding Policy and can be used by the CO “CF “ADRA Ukraine” for decision-making in the field of safeguarding:

- *The Inter-Agency Misconduct Disclosure Scheme (MDS);*
- *The Six Core Principles Relating to Sexual Exploitation and Abuse of the Inter-Agency Standing Committee (IASC);*
- *The Minimum Standards for Child Protection in Humanitarian Action (CPMS);*
- *The Sphere Project: Humanitarian Charter and Minimum Standards in Humanitarian Response;*
- *The United Nations Convention on the Rights of the Child;*
- *The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime;*

- *The UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse.*

The following guiding principles were used by the CO “CF “ADRA Ukraine” when developing its Safeguarding Policy and can be used to guide its safeguarding decision-making:

- 4.1. While the CO “CF “ADRA Ukraine” recognises that laws and regulations may differ from place to place where we operate, the Safeguarding Policy is based on international best practice and reflects the organisation’s commitment to ensuring that our staff and implementing partners conduct themselves and the activities of the CO “CF “ADRA Ukraine” in the best interests of the people we work with. In some cases, the Safeguarding Policy may require that staff and implementing partners adhere to stricter standards than those required by applicable law.
- 4.2. The CO “CF “ADRA Ukraine” applies a person-centred approach to safeguarding issues, which means giving priority to the best interests of the person(s) who are actually or potentially affected by the implementation of measures or decision-making in the field of safeguarding. Accordingly, the CO “CF “ADRA Ukraine” will carefully consider the safety and well-being of all persons involved in safeguarding matters. In addition, the CO “CF “ADRA Ukraine” prefers a survivor-centred approach to minimise further harm to survivors and their families by seeking to create an enabling environment where the rights and wishes of survivors are respected, their safety is guaranteed, and they are treated with dignity and respect.
- 4.3. The CO “CF “ADRA Ukraine” pays special attention to the safety, rights and dignity of the people we work with and other vulnerable groups. The CO “CF “ADRA Ukraine” acknowledges that some groups, such as people with different sexual orientations, gender identities, etc., face difficulties in accessing humanitarian assistance due to discrimination or lack of awareness of their unique needs. Due care must be taken to ensure that all persons who have been subject to a security-related misconduct under this Policy are able to receive support and services in a timely manner in accordance with their requests for such services or support.
- 4.4. The CO “CF “ADRA Ukraine” recognises that confidentiality of information and data protection are of utmost importance. All materials relating to safeguarding complaints will be handled with care and confidentiality to protect all those involved.
- 4.5. The CO “CF “ADRA Ukraine” will seek to engage only staff and implementing partners who are in line with our mission and values. The CO “CF “ADRA Ukraine” will endeavour to conduct background checks and/or take other due diligence measures to prevent the involvement of persons guilty of exploitation or abuse (Annex 3).
- 4.6. When portraying the work of the CO “CF “ADRA Ukraine” and the communities we serve, we will ensure that our communications are accurate and reflect affected populations with dignity and respect, with special protection given to children and the most vulnerable individuals. Whenever possible, the CO “CF “ADRA Ukraine” will try to obtain informed consent from the beneficiaries to publish information.

- 4.7. The CO “CF “ADRA Ukraine” will carefully consider and assess the risk of harm to the health, welfare or rights of the population we serve. Risk assessments are carried out at all stages of project implementation, as well as at the organisational level in addition to the project level (Annex 4).
- 4.8. The CO “CF “ADRA Ukraine” regularly (at least annually) conducts trainings and information sessions for all staff, volunteers and partners on safeguarding and considers safeguarding as a cross-cutting topic that concerns all departments, sectors and offices of the CO “CF “ADRA Ukraine”.

5. Provisions of the Safeguarding Policy

The Safeguarding Policy of the CO “CF “ADRA Ukraine” consists of four sections:

1. *Child Safeguarding Policy;*
2. *Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy;*
3. *Protection of Adults at Risk Policy;*
4. *Counter-Trafficking in Persons (CTiP) Policy.*

5.1. Child Safeguarding Policy

a. Purpose of the Child Safeguarding Policy

The primary purpose of this Policy is to ensure the protection of children who come into contact with the staff, volunteers, contractors, and partners of the CO “CF “ADRA Ukraine” from all forms of violence, exploitation, abuse, or neglect.

b. Principles of the Policy

1 Safety and Well-Being of Children

The primary purpose of this Policy is to ensure the protection of children who come into contact with the staff, volunteers, contractors, and partners of the CO “CF “ADRA Ukraine” from all forms of violence, exploitation, abuse, or neglect.

2 Non-Discrimination

Ensuring equal protection for all children, regardless of race, sex, religion, nationality, disability, or social status.

3 Protection from Abuse

The CO “CF “ADRA Ukraine” upholds a zero-tolerance policy towards any form of physical, psychological, sexual, or economic violence against children.

4 Compliance with National and International Standards

The activities of the CO “CF “ADRA Ukraine” are based on compliance with Ukrainian legislation, in particular the Law of Ukraine “On Child Protection,” as well as international conventions, including the UN Convention on the Rights of the Child. In cases where Ukrainian laws, customs, or traditions conflict with the UN Convention on the Rights of the Child and the Universal Declaration of Human Rights, the latter two shall take precedence. These standards are grounded in the belief that all children and adults have equal value, that children hold special rights, and that everyone has a responsibility to protect them.

The CO “CF “ADRA Ukraine” recognises the sensitive nature of responding to child protection cases and will engage the appropriate services and individuals when necessary.

In representing the CO “CF “ADRA Ukraine”, individuals are expected to:

- a. Disclose to the CO “CF “ADRA Ukraine” any criminal charges, convictions, or allegations—past or present—related to the exploitation or abuse of children, including those under customary law, that occurred before or during their engagement with the CO “CF “ADRA Ukraine”.
- b. Treat all children with respect, regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, disability, or any other relevant status.
- c. Refrain from using language or behaviour towards children that is inappropriate, offensive, aggressive, sexually provocative, demeaning, or culturally insensitive.
- d. Never engage in any form of sexual relations or sexual activity with children under the age of 18, including the exchange of money, goods, services, or favours for sexual acts.
- e. Avoid forming special relationships with a particular child or children, including showing favouritism, giving gifts, or providing special attention;
- f. Ensure, where possible, that another adult is present when working with or around children.
- g. Avoid participating in uncontrolled individual consultations with minors and children.
- h. Never invite unaccompanied children into your home, hotel room, or any closed space, unless they are at immediate risk of injury or physical danger.
- i. Never sleep in close proximity to children without supervision unless absolutely necessary. In such cases, obtain your supervisor’s approval and ensure another adult is present;
- j. Never give minors illegal drugs or any drinks containing alcohol;
- k. Use all computers, mobile phones, video cameras, cameras, and social media responsibly and never exploit, harass, or access child exploitation material by any means;
- l. Never apply physical punishment to children;

- m. Refrain from hiring children for domestic or other work that is inappropriate for their age or stage of development, interferes with their time for education and recreation, or creates a significant risk of injury¹;
- n. Comply with all relevant international and local laws, including labour laws relating to child labour;
- o. Immediately report concerns, suspicions or allegations (including any allegations made by a child) of child exploitation and abuse, as well as violations or non-compliance with this Policy, in accordance with the required procedures;
- p. Be aware of appropriate behaviour and avoid actions or behaviour that may be perceived by others as child exploitation and abuse.

When photographing or filming a child in the course of work, one must:

- a. Evaluate and try to respect local traditions or restrictions on the reproduction of personal images before photographing or filming a child;
- b. Obtain informed consent from the child, the child's parent or guardian before photographing or filming the child. As part of this, one must explain how the photo or footage will be used. Consent should be in written form; if this is not possible and verbal consent is given, it must be witnessed and documented;
- c. Ensure that all photographs, films, videos, and DVDs portray children in a respectful and dignified manner and never in ways that are vulnerable or submissive. Children should be appropriately clothed and not shown in poses that could be interpreted as sexually suggestive;
- d. Ensure that images truthfully represent the context and facts;
- e. Protect children's privacy by ensuring that file labels, metadata, or text descriptions do not reveal identifying information about the child when images are transmitted electronically or published in any format.

5.2. Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy

a. Purpose of the PSEAH Policy

Sexual abuse — actual or threatened physical sexual violence, carried out by force or under unequal or coercive conditions;

Sexual exploitation — the attempted or actual abuse of a position of vulnerability, unequal position or trust to obtain sexual services, including, but not limited to, for personal enrichment, social or political benefits from the sexual exploitation of another person.

Sexual harassment — any unwelcome sexual advances, comments, explicit or implicit requests for sexual favours, touching, jokes, gestures, or any other sexual communication or behaviour, whether

¹ *Child labour includes work that is mentally, physically, socially, or morally dangerous and harmful to children, and/or interferes with their schooling by depriving them of the opportunity to attend school, forcing them to leave school prematurely, or requiring them to combine school with excessively long and heavy work. Child labour includes domestic servitude. Children who have reached the minimum legal working age may engage in employment that complies with national laws and international standards.*

verbal, written, or visual, by any person towards another in the workplace. This also includes unwelcome solicitation of sexual services.²

This Policy does not apply to:

Bullying and discrimination (including workplace sexual harassment and inappropriate sexual conduct) — which are governed by the personnel policies of the local office.

Gender-based violence — which is addressed in the programmatic activities of CO “CF “ADRA Ukraine” during project design, implementation, and monitoring.

The purpose of the PSEAH Policy is to ensure that we are ethically committed to preventing SEA:

- The CO “CF “ADRA Ukraine” believes that all people have the right to live free from sexual abuse and exploitation.
- The CO “CF “ADRA Ukraine” recognises that our work often places us in a position of power over the communities we work with, especially adults and children at risk.
- Representatives of the CO “CF “ADRA Ukraine” have a moral and legal obligation to use their power respectfully and not to abuse the power and influence they possess.
- The CO “CF “ADRA Ukraine” will not tolerate its employees, volunteers, consultants, partners or any other representatives associated with the performance of its work who commit any form of sexual harassment, exploitation or abuse (SEA).
- Representatives of the CO “CF “ADRA Ukraine” are committed to creating and maintaining an environment that promotes the protection of those we help and our own representatives who are victims of sexual harassment, exploitation or abuse (SEA).
- It is the responsibility of all representatives of the CO “CF “ADRA Ukraine” to raise any concerns that you have or that are reported to you in accordance with this Policy. It is not your responsibility to decide whether sexual harassment, abuse or exploitation has occurred.
- All complaints related to SEA are taken seriously by the CO “CF “ADRA Ukraine” and shall be addressed in accordance with the procedures and deadlines for handling complaints.
- The CO “CF “ADRA Ukraine” will conduct a thorough and fair investigation of complaints that indicate a possible violation of this Policy.
- In the event of a complaint, the CO “CF “ADRA Ukraine” ensures that a victim-centred approach is followed.

The CO “CF “ADRA Ukraine” will not tolerate sexual harassment, exploitation and abuse committed by its representatives; substantiated allegations of sexual harassment, exploitation or abuse (SEA) will result in appropriate disciplinary action.

² As defined in the UN Secretary-General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse, ST/SGB/2003/13, 9 October 2003

b. PSEAH Guidelines and Standards:

CO “CF “ADRA Ukraine” adheres to the core principles adopted by the Inter-Agency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse³.

- 1. Sexual harassment, exploitation and abuse by representatives of the CO “CF “ADRA Ukraine” are acts of gross misconduct and therefore constitute grounds for termination of employment or involvement in work with the organisation.*
- 2. Sexual relations with children (persons under the age of 18) are prohibited regardless of the local age of consent, i.e. local or national laws of the host country. Mistaken belief regarding the age of a child is not a valid defence.*
- 3. The exchange of money, work, goods or services for sex, including sexual services or other forms of humiliating or exploitative behaviour by representatives of the CO “CF “ADRA Ukraine” is prohibited. This includes the exchange of aid belonging to beneficiaries.*
- 4. Any sexual relationship between those providing assistance and the person receiving such assistance that involves the possibility of exploiting an unequal position (improper use of power) is prohibited. Such relationships undermine the credibility and integrity of aid work. Romantic relationships with beneficiaries are regulated by Annex 2.*
- 5. When a representative of the CO “CF “ADRA Ukraine” has concerns or suspicions about sexual harassment, exploitation and abuse by a representative of the CO “CF “ADRA Ukraine”, they should report such concerns using the established reporting procedures and mechanisms.*
- 6. Representatives of the CO “CF “ADRA Ukraine” are obliged to build and maintain an environment that prevents sexual harassment, exploitation and violence and promotes the implementation of this Policy and the Code of Conduct. Managers at all levels of the CO “CF “ADRA Ukraine” have a special responsibility to maintain and develop systems that support this environment.*

The CO “CF “ADRA Ukraine” strictly prohibits all its representatives from engaging in any of the following actions:

- ✓ Offering special privileges (including money, employment, goods, or services) to programme participants in exchange for sexual services—whether explicitly stated, implied, or demanded.
- ✓ Threatening or implying that refusal or unwillingness of a person to submit to sexual harassment or demands will affect their right to assistance or support within the project.
- ✓ Verbal behaviour such as derogatory sexual remarks, comments about a person’s body or clothing, degrading sexual terms used to describe someone, sexually provocative or obscene letters, notes, emails or invitations, offensive or inappropriate remarks, offensive nicknames, insinuations, slurs, jokes, sexual harassment, or propositions.

³ *The Six Core Principles of the IASC on Protection from Sexual Exploitation and Abuse, 2019, <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>.*

- ✓ Visual behaviour such as leering, sexual gestures, displaying or sharing sexual objects or images, including cartoons, graffiti, posters or magazines, including in electronic format.
- ✓ Actual or attempted physical contact or behaviour such as patting, pinching, impeding movement, or any other offensive touching.
- ✓ Expressing sexual interest in or engaging in any sexual relations with children (persons under the age of 18). A mistaken belief about the age of a person is not an acceptable defence.
- ✓ Using children or adults to provide sexual services to others.
- ✓ Using computer equipment, other devices, or office space of the CO “CF “ADRA Ukraine” to view, download, create, distribute, or store in any format inappropriate materials, including but not limited to sexually explicit content, including child or adult pornography.
- ✓ Condoning or facilitating human trafficking.
- ✓ Any other actions that may constitute sexual harassment, sexual exploitation, or sexual abuse or that contradict the principles outlined in this Policy.

c. Survivor-Centred Approach.

The CO “CF “ADRA Ukraine” is guided by the principles of the Survivor-Centred Approach in all cases of response to reports of sexual exploitation, abuse, or other forms of misconduct. It means:

- ✓ The safety, physical and psychosocial well-being of the survivor is the priority.
- ✓ All information is treated confidentially. No personal data is shared without the survivor’s explicit consent.
- ✓ We act respectfully, without bias, recognising the survivor’s right to their own perspective on the situation.
- ✓ All actions within the framework of investigation, accompaniment, or support are taken only after obtaining informed consent.
- ✓ The survivor has the right to decide what to do next, including the right to refuse to participate in formal procedures.

The CO “CF “ADRA Ukraine” will conduct service mapping and establish referral pathways to ensure readiness to provide support to survivors when needed.

5.3. Protection and Safeguarding of Adults at Risk Policy

a. Purpose of the Protection and Safeguarding of Adults at Risk Policy

Many communities that the CO “CF “ADRA Ukraine” works with receive assistance due to the complex and dangerous environments in which they live. In many contexts, entire communities and groups may also be vulnerable because they live in remote, insecure or inaccessible areas, or because they are geographically located and have limited access to assistance and protection. Groups may be underserved and experience poor treatment due to citizenship, nationality, race, language, gender identity, sexual orientation, religion or political views.

The CO “CF “ADRA Ukraine” works with communities to promote the rights and dignity of adults who may be at increased risk of violence or exploitation.

An adult at risk is any person aged 18 or over who is at risk of abuse or neglect due to their care and/or support needs. They may be at risk if they experience or are at risk of experiencing violence or neglect, and due to such care and support needs they are unable to protect themselves from the threat or experience of violence or neglect. An adult at risk may have an illness that affects their mental or physical health, a learning or physical disability, a drug or alcohol use disorder, or may be frail. Individuals and groups have different capacities, needs and vulnerabilities that change over time. Individual factors such as age, gender, disability, and legal status or health condition may limit access to assistance; the interaction of such factors in the relevant context may strengthen capacities, increase resilience, or worsen access to assistance for any individual or group.

Violence against adults at risk can take many forms, including but not limited to:

- physical violence;
- violence by an intimate partner;
- sexual violence;
- psychological violence;
- financial/material violence;
- modern slavery, human trafficking and forced labour;
- ill-treatment on the basis of gender identity, race, national origin, religion, age, disability, sexual orientation, political views, etc;
- neglect.

b. Provisions of the Policy on the Safeguarding of Adults at Risk

- The CO “CF “ADRA Ukraine” strives to protect adults at risk from violence or neglect, as well as to empower them to make informed choices.
- The CO “CF “ADRA Ukraine” recognises that all adults have rights regardless of their gender, disability, nationality, sexuality, religion, age or other factors. Special resources and attention may be required to ensure the protection of adults at risk.
- The CO “CF “ADRA Ukraine” will respond to violations in the field of safety and protection of adults at risk effectively and proportionately, taking or facilitating actions for persons at risk.
- The staff and representatives of the CO “CF “ADRA Ukraine” will not participate in any kind of violence against adults and will work to ensure the safety and protection of adults at risk of violence.
- The CO “CF “ADRA Ukraine” will take into account the risks and characteristics of most-at-risk adults in its assessments and develop risk reduction measures to integrate them into its programme activities to address them.

5.4. Counter-Trafficking in Persons (CTiP) Policy

a. Purpose of the Counter-Trafficking in Persons Policy

The CO “CF “ADRA Ukraine” is categorically opposed to human trafficking and forced labour in any form and prohibits its staff from participating in actions that facilitate or support human trafficking. The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to obtain the consent of a person having

control over another person, for the purpose of exploitation⁴. Such exploitation shall include, at a minimum, the exploitation of others through prostitution or other forms of sexual exploitation, forced labour or services, slavery or acts similar to slavery, servitude or the removal of organs. The consent of the victim of trafficking in human beings to the planned exploitation as set out above is not considered valid if any of the means of influence mentioned above are used. The recruitment, transportation, transfer, harbouring or receipt of a person under the age of 18 for the purpose of exploitation shall be considered trafficking in human beings, even if it does not involve the use of threats or other means described above.

b. This Policy is based on the current legislation of Ukraine and international standards for combating human trafficking, including:

- *Law of Ukraine “On Combating Human Trafficking” dated 20 September 2011;*
- *Criminal Code of Ukraine (Article 149 — Trafficking in persons or other illegal transactions regarding an individual);*
- *UN Convention on the Elimination of All Forms of Discrimination against Women;*
- *The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the UN Convention against Transnational Organised Crime.*
- *The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol – November 2000);*
- *The UK Modern Slavery Act 2015 (March 2015).*

c. Prohibited Behaviour for the Purpose of Combating CTiP

Staff and representatives of the CO “CF “ADRA Ukraine” are prohibited from:

- engaging in human trafficking;
- purchasing commercial sexual services, regardless of whether it is legal in the jurisdiction where the purchase occurs and regardless of whether such conduct takes place during working or non-working hours. (“Commercial Sexual Services” means any sexual act for which a person receives something of value. This includes commercial items or situations such as a job or similar promises);
- using forced labour;
- destroying, concealing, confiscating, or otherwise denying employees access to their identity or immigration documents;
- denying reimbursement for return travel expenses for certain employees who have completed employment or work outside their country of residence (except where required by law or regulation);
- inducing a person to work or offering employment through false or fraudulent statements, assurances, or promises regarding such employment;
- charging recruitment fees to potential employees; providing or arranging accommodation that does not meet the housing and safety standards of the host country;

⁴ *The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the UN Convention against Transnational Organised Crime.*

- where required by applicable law, failing to provide an employment agreement, hiring contract, or similar document in writing, in the person's native language, and prior to their departure from their country of origin.

6. Reporting Requirements, Mechanisms and Safeguards

This section outlines the reporting requirements, mechanisms, and safeguards in line with the Whistleblower Policy of CO "CF "ADRA Ukraine".

Key Reporting Requirements and Mechanisms

Employees and implementing partners **are required to report** any actual or suspected violations of this policy **immediately** using one of these key reporting mechanisms:

- Personal message (in person):
 - To the Head
 - To the President of the organisation
 - To the manager of security and social protection
 - To the Human Resources Department
- Reporting via email: **protection@adra.ua**
- Notification via the online form: <https://www.adra.ua/special-complaint/>

*The form allows you to submit an anonymous report

- Hotline: **0 800 20 13 30**

To contact the Safeguarding and Social Protection Manager (by calling the hotline and having the call redirected to the relevant specialist by the operator)

- Phone number for complaints and suggestions **+38 073 170 7271**
- Form for complaints and suggestions <https://forms.office.com/e/ubQAiA5wAR>

- Reporting through ADRA INTERNATIONAL’s online form in cases of distrust towards CO “CF “ADRA Ukraine” management actions:
<https://secure.ethicspoint.com/domain/media/en/gui/76151/index.html> or protection@adra.org

7. Transparency and Accountability

The CO “CF “ADRA Ukraine” promotes the creation of an open and transparent environment. Safeguarding concerns can be openly raised and discussed, and instances of poor practice and unacceptable behaviour can be challenged and addressed. Safeguarding measures are regularly reviewed and strengthened to ensure our accountability to the affected population, staff and donors.

The CO “CF “ADRA Ukraine” is also responsible for informing and empowering people — especially women, children, and persons with disabilities — so that they are aware of their right to protection and are able to exercise it. The CO “CF “ADRA Ukraine” will cooperate with everyone — from local community representatives to implementing partners — to ensure understanding of the essence of this Policy, individual rights, and reporting mechanisms.

At a minimum, beneficiaries have the right to know:	At a minimum, the representatives of the CO “CF “ADRA Ukraine” have the right to know:
☐ Expected standards of behaviour to be followed by representatives of the CO “CF “ADRA Ukraine”; ☐ Clear information and updates on the activities of the CO “CF “ADRA Ukraine”, including transparency on funding sources, criteria for selecting beneficiaries and their participation; ☐ How to obtain or request additional information if necessary; ☐ The right to refuse bribes and not to participate in fraudulent activities; ☐ The right to receive humanitarian assistance without the threat of sexual exploitation, abuse, or harassment (PSEAH); ☐ Where and how to report incidents of sexual harassment, exploitation, and abuse (PSEAH);	☐ Their involvement/employment through the induction and orientation process; ☐ The policies, procedures, and benefits that directly relate to them (policies, manuals, standard operating procedures, etc.); ☐ How to obtain the necessary support; ☐ The expected standards of conduct when representing CO “CF “ADRA Ukraine”; ☐ To understand and have access to safeguarding policies and procedures; ☐ If you are the subject of an investigation — you have the right to know the specific allegations made against you and to retain employment benefits during the investigation; ☐ Access to support mechanisms, including psychological counselling;

☐ What to expect after filing a complaint, including potential referrals, timelines, roles, responsibilities, and possible limitations of the involved parties; ☐ What steps CO “CF “ADRA Ukraine” will take to ensure safety and confidentiality.	☐ Access to and awareness of grievance mechanisms.
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8. Investigation of Violations of This Policy

a. Each report shall be investigated within a specified timeframe by a designated committee appointed by the management of the organisation. If a violation is confirmed, the perpetrators shall be subject to disciplinary actions in accordance with the procedures established by the CO “CF “ADRA Ukraine”.

Disciplinary Consequences

Any confirmed violation of the Safeguarding Policy and Code of Conduct may be considered a serious breach of labour discipline and serve as grounds for dismissal in accordance with the Disciplinary Policy of CO “CF “ADRA Ukraine”. Any person covered by this Policy who is found guilty of harassment, coercion, intimidation, or retaliation against another person in violation of this Policy shall be subject to immediate and appropriate disciplinary measures, up to and including termination.

- a. If the affected person chooses to contact the relevant authorities (for example, in the case of a criminal offence such as rape), the CO “CF “ADRA Ukraine” will provide the necessary support in this process.
- b. An investigation into a violation of this Policy is an internal administrative procedure in which the organisation seeks to determine whether an employee or employees of the organisation have violated this Policy in a particular instance.
- c. The investigation is carried out by anonymous and confidentially interviewing employees and members of the Organisation, collecting information and facts that would confirm the likelihood or absence of a violation. In order to determine whether a breach has occurred, more information is needed, which may require an investigation, including gathering evidence, interviewing witnesses, and confirming the breach.
- d. Investigation stages include:
 - reviewing the complaint/report;
 - continuous support to the survivor throughout the entire investigation process;
 - processing of primary information;
 - an anonymous survey of witnesses to unacceptable behaviour;
 - systematisation of the collected information;
 - formation of an evidence base;
 - analysis of information and preparation of a conclusion.
- e. The process of investigating a report of a violation of this Policy may take from 4 weeks to 3 months.

- f. The Complaint and Feedback Mechanism (CFM) Policy of the CO “CF “ADRA Ukraine” outlines the procedure for handling feedback and complaints that do not relate to the implementation of projects/programmes of the CO “CF “ADRA Ukraine”, especially those of a sensitive nature, including cases of sexual exploitation and abuse (SEA), in accordance with the guidance of the Inter-Agency Standing Committee (IASC), specifically the Inter-Agency Referral Mechanism of the Humanitarian Country Team (HCT) for SEA reports in Ukraine, to the appropriate humanitarian coordination bodies (e.g. humanitarian actors) and clusters.
- g. The community-level Complaint and Feedback Mechanisms (CFMs) of the CO “CF “ADRA Ukraine” are designed to ensure that disaster-affected communities have access to safe, confidential channels to share information, provide feedback, and raise concerns on issues within the organisation’s scope of responsibility. Complaints received through the CFM that are classified as sensitive (i.e. Category 5 or 6 complaints) must be forwarded to the following email address: [**protection@adra.ua**](mailto:protection@adra.ua)

9. Protection of Whistleblowers

In accordance with the Whistleblowing Policy of the CO “CF “ADRA Ukraine”, the following protection measures apply to whistleblowers who report safeguarding concerns:

- **No Retaliation:** No adverse disciplinary action will be taken against any staff member as punishment for raising a concern that the employee reasonably believes to be true.
- **Protection from Harassment:** Harassment of any staff member who has made a report in good faith will not be tolerated. If any instance of harassment is identified, the responsible person will be subject to disciplinary action, up to and including termination.
- **Confidentiality:** The CO “CF “ADRA Ukraine” will maintain the highest possible level of confidentiality during the investigation of any allegations. Investigations and the results of investigations will be discussed only with those who need to know.
- **Anonymous Reports:** Individuals are encouraged—but not required—to disclose their identity when submitting a report. In some cases, appropriate follow-up questions and investigative procedures may not be possible if the source of the information is not identified.
- **Malicious Reports:** Individuals who make statements with reckless disregard for their truthfulness may be subject to disciplinary measures, up to and including termination

10. Leadership

- a. The leadership and Board of Directors of the CO “CF “ADRA Ukraine” are expected to lead by example and promote a strong safeguarding culture that acknowledges structural inequalities based on gender, ethnicity, socio-economic status, sexual orientation, and age in the workplace.
- b. The CO “CF “ADRA Ukraine” will consider gender and safeguarding expertise as desirable qualifications and experience in the selection of new Board members.
- c. The Administrative Committee (ADCOM) and senior management of the CO “CF “ADRA Ukraine” will set clear expectations and model respectful behaviour in their professional conduct.

- d. The designated Safeguarding Focal Point in the CO “CF “ADRA Ukraine” holds overall responsibility for the development and implementation of policies and measures to prevent sexual exploitation, abuse, and harassment (SEAH). This person will regularly report to ADCOM on matters related to SEAH prevention.
- e. The leadership of the CO “CF “ADRA Ukraine” will foster a culture of openness to raise concerns related to SEAH prevention.

11. Policy Implementation and Monitoring

The CO “CF “ADRA Ukraine” may, at its discretion but in alignment with its core principles, make exceptions to this policy and/or its related procedures.

This Policy is subject to revision as needed, taking into account changes in legislation, the CO “CF “ADRA Ukraine” internal procedures, or international requirements within the ADRA network.

ANNEX 1: Definitions of Key Terms Used in the Safeguarding Policy

Anonymity — a situation where a person is unknown, which makes it impossible to identify, contact and/or trace them.

Beneficiary — individuals, groups or organisations identified as recipients of humanitarian assistance in the relief efforts.

Implementing partners — vendors, service providers, contractors, sub-recipients or other partners with whom we enter into agreements. **Perpetrator** — a person who commits or attempts to commit a violation in the field of safety and security.

Child — any person under the age of 18, regardless of local customs or the age of majority or age of consent at the local level.

Child labour — work that deprives children of their childhood, potential, and dignity, and that is harmful to their physical and mental development. This includes work that is mentally, physically, socially or morally dangerous and harmful, and/or interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to combine school attendance with excessively long and heavy work. (“Decent work” refers to acceptable forms of safe employment for children who have reached the minimum legal working age.)

Child marriage — any formal marriage or informal union where at least one party is under the age of 18.

Adults at risk — any person aged 18 or over who is at risk of abuse or neglect due to their care and/or support needs. They may be at risk if they are experiencing or are at risk of experiencing abuse or neglect and, as a result of their care and support needs, are unable to protect themselves from the threat or experience of abuse or neglect.

Spiritual violence — the use of spiritual or religious beliefs to harm, frighten or control a person. This may include forcing a person to participate in spiritual or religious practices when they do not want to. This may also include not allowing a person to participate in spiritual or religious practices that are important to them.

Exploitation — the use of one’s position, power, influence, or control to pressure, coerce, or manipulate a person into acting against their will or against their interests and well-being, including threats to withhold assistance, threats to make false statements about the person, or other negative consequences in the workplace or community—typically for the benefit, gratification, or advantage of another person.

Child exploitation — the use of children for the benefit, pleasure or gain of another person, often resulting in unfair, cruel and harmful treatment of the child. Such activities are harmful to the child’s physical or mental health, education, moral or social emotional development. This includes manipulation, abuse, violence, victimisation, oppression or mistreatment.

Emotional abuse — the harm caused by persistent or severe emotional mistreatment or rejection, such as humiliation, threats, bullying, denial of care and custody, or actions that lead to negative consequences for the behaviour and emotional state/development of an adult or child.

Safeguarding — the responsibility of an organisation to ensure that its personnel, activities and programmes do not harm the people with whom they work, with particular attention to those who may be most vulnerable to exploitation and/or abuse.

Protection — all measures aimed at ensuring full respect for human rights in accordance with the spirit and letter of the relevant body of legal norms, including international humanitarian law and refugee law.

Informed consent — permission given after careful consideration, based on a clear assessment and understanding of the facts, outcomes and future consequences of an action. Informed consent to receive services requires the voluntary agreement of a person who understands the options/services offered, is not under pressure to accept the services, and is of legal capacity and of an appropriate age to give consent. There may be cases where consent is not possible due to cognitive impairment and/or physical, sensory or intellectual disability.

Confidentiality — a principle used to restrict access to and dissemination of information. In the case of sexual exploitation, violence, fraud and corruption, the principle of confidentiality requires that information be available only to a limited number of authorised persons to manage/resolve the case. Confidentiality helps to create an atmosphere in which all those involved are more willing to tell their side of the story and builds trust in the system and the organisation.

Violence — the improper treatment of a person that causes harm or injury. There are several forms of violence (physical, verbal, sexual, emotional, etc.), any or all of which can be committed as a result of deliberate intent, neglect or ignorance. Intimate partner violence — behaviour by an intimate partner or former partner that causes physical, sexual or psychological harm, including physical aggression, coercion to have intimate relations, psychological abuse and controlling behaviour.

Child abuse — an act or omission by a parent, guardian and/or caregiver that results in the death, serious physical or emotional harm, sexual abuse or exploitation of a child, or that places a child at imminent risk of serious harm and/or seriously affects the child's long-term development and potential.

Harmful traditional practices — practices based on cultural values and beliefs that have negative consequences for children, such as witchcraft, early or forced marriage, female genital mutilation, sometimes called female circumcision.

Neglect — the constant failure to meet the basic physical and/or psychological needs of a person, which can lead to a serious deterioration in the health or development of such a person.

Survivor-centred approach — creating an enabling environment where the rights and wishes of survivors are respected, their safety is guaranteed, and they are treated with dignity and respect.

Person-centred approach — giving primary consideration to the best interests of the person(s) actually or potentially affected by the implementation of measures or decisions in the field of safety

and security, as well as careful consideration of the safety and well-being of other persons involved in the issue of safety and security.

Personnel — directors, officers, employees, consultants, volunteers, interns, agents or other employees or representatives of the CO “CF “ADRA Ukraine”.

Affected person — a person who is experiencing or has experienced violations in the field of safety and protection. The term “affected person” implies strength, endurance and the ability to survive.

ADRA Ukraine representatives — this term refers to anyone who represents ADRA Ukraine: all permanent, temporary and part-time staff; board members; interns; volunteers; (local implementing partners and service providers).

Forced marriage — a marriage or an informal union in which one and/or both parties did not personally express their full and voluntary consent to such a union.

Child marriage — considered a form of forced marriage, provided that one and/or both parties have not expressed full, voluntary and informed consent.

Psychological violence — behaviour or planned harm or abandonment, preventing contact or communication, controlling, restricting access, humiliation, intimidation, coercion, harassment, verbal abuse and bullying.

Investigation — an internal administrative procedure during which the CO “CF “ADRA Ukraine” collects and examines information to determine whether there has been a violation of the policies of the CO “CF “ADRA Ukraine” by staff or implementing partners.

Sexual exploitation — the attempted or actual abuse of a position of vulnerability, unequal position or trust to obtain sexual services, including, but not limited to, for personal enrichment, social or political benefits from the sexual exploitation of another person.

Sexual abuse — actual or threatened physical sexual violence, carried out by force or under unequal or coercive conditions.

Sexual harassment — any unwelcome sexual advances, comments, explicit or implicit requests for sexual favours, touching, jokes, gestures, or any other sexual communication or behaviour, whether verbal, written, or visual, by any person towards another in the workplace. This also includes unwelcome solicitation of sexual services.

Complaint — an allegation of behaviour that may violate our safety and security policy.

Modern slavery — the recruitment, transportation, transfer, harbouring, or receipt of children, women, or men through the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, or by giving or receiving payments or benefits to obtain the consent of a person having control over another person, for the purpose of exploitation

Human trafficking — the recruitment, transportation, transfer, harbouring, or receipt of persons through the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of

power or of a position of vulnerability, or by giving or receiving payments or benefits to obtain the consent of a person having control over another person, for the purpose of exploitation.

Child safeguarding (protection and welfare) — actions taken to promote the welfare of children and protect them from harm, including protecting children from violence and abuse, preventing harm to their health or development, ensuring they grow up with safe and effective care, and taking action to help them achieve the best possible outcomes.

Physical violence — the use of physical force that causes harm. Physical violence includes, but is not limited to: pushing, beating, slapping, shaking, throwing, punching, kicking, biting, setting on fire, strangling and poisoning.

Financial/material violence — theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or misuse or misappropriation of property, possessions or benefits

Annex 2. Sexual or Romantic Relationships

The CO “CF “ADRA Ukraine” prohibits its representatives from engaging in sexual or romantic relationships with members of communities they are directly working with. This is because, as representatives of the CO “CF “ADRA Ukraine”, each individual has potentially greater access to goods, services and power than members of the community of programme participants, which can be used to pressure or exploit them. However, it is known that representatives of the CO “CF “ADRA Ukraine” are often also members of the programme community, and therefore may be married or have long-term romantic relationships in the programme community. Only in such cases may such relationships be permitted. It is expected that all representatives of the CO “CF “ADRA Ukraine” will exercise discretion, professionalism and good judgement when romantic relationships arise between representatives of the CO “CF “ADRA Ukraine” and programme participants.

In addition, the CO “CF “ADRA Ukraine” prohibits employees from engaging in sexual or romantic relationships between employees or persons during the recruitment process. This creates a conflict of interest and is likely an abuse of power that may be difficult to report confidentially or without fear of retaliation.

In such cases, the CO “CF “ADRA Ukraine” requires that the relevant personnel disclose any relationship with persons receiving assistance from the CO “CF “ADRA Ukraine” as provided for in the Conflict of Interest Policy. This is necessary to assess the risk of unequal distribution of power and to provide appropriate guidance, if necessary.

Relationships that are not formally disclosed and involve a direct supervisor or manager should be investigated as a violation of the disclosure requirement in accordance with the policies of the CO “CF “ADRA Ukraine” and as potential sexual harassment with the same disciplinary consequences of sexual exploitation.

Annex 3. Safe Recruitment Requirements for the CO “CF “ADRA Ukraine” Staff

- ✓ Checklist for the Safeguarding Policy: Recruitment, Contracting, and Performance Management
- ✓ Include a statement in job advertisements informing candidates that background and reference checks will be conducted and that ethics form part of the annual performance review.
- ✓ Require applicants to self-declare previous instances of sexual or other misconduct, past employment terminations, criminal convictions and suspicions registered with government agencies regarding contact with children, and consent to the disclosure of any such information by their former employers during reference checks. This request and the applicants’ responses must be documented.
- ✓ Documented oral inspections.
- ✓ Conduct background checks (e.g. police records, Google searches) and contact a vetting service for previous misconduct, in compliance with local laws on employment, privacy, and data protection. All representatives who come into contact with children need a documented criminal record check.
- ✓ In limited circumstances, it may not be possible to obtain a reliable criminal record check. Instead, a statutory declaration or local legal equivalent may be adopted, indicating efforts made to obtain a foreign police check and disclosing any charges and spent convictions related to child exploitation, as well as completed self-declaration forms.
- ✓ Review existing staff if there have been changes in responsibilities and positions that require increased engagement with vulnerable populations.
- ✓ Repeat background checks on existing staff every three to five years.
- ✓ Ensure gender-balanced interviews for staff during recruitment and conduct gender-neutral interviews.
- ✓ Ask candidates interview questions related to ethics and ethical dilemmas (e.g. “What does an ethical organisation mean to you?” or “Tell me about a time you faced an ethical dilemma”.) For positions that work directly with vulnerable populations, interviews should include position-specific behavioural questions. □ Require candidates to review and sign the Code of Conduct (or include it in their employment contracts) before they are offered a contract.
- ✓ Include a clause on the Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH) in employment contracts, including in subcontracting agreements.

The following PSEAH clause may be used: “The Contractor shall take all reasonable steps to prevent the sexual exploitation, abuse or misuse of any person by its employees or any other persons engaged and controlled by the Contractor to perform any services under the Contract. Any violation of the provisions by the Contractor shall entitle the CO “CF “ADRA Ukraine” to immediately terminate the contract”

- ✓ Outline disciplinary measures in the case of substantiated allegations of sexual exploitation and abuse (SEA) (e.g., termination of contract).
- ✓ Include training on the Protection from Sexual Exploitation and Abuse (PSEA) Policy as part of the onboarding process and provide refresher courses on a regular basis.
- ✓ Include adherence to the Code of Conduct (e.g., participation in SEA training) in staff performance evaluations.
- ✓ Include in senior staff performance evaluations their effectiveness in creating and maintaining an environment that prevents and responds to sexual exploitation and abuse (SEA).
- ✓ Freeze professional promotion/hiring opportunities for persons under investigation.
- ✓ In cases of proven misconduct, take strong disciplinary action (e.g., dismissal, suspension, written censure or other administrative/corrective action) and, where criminal behaviour may have occurred, consider reporting the incident to local law enforcement.
- ✓ Maintain an internal database that documents any disciplinary action taken against staff, including dismissal, to avoid rehiring at a later date.
- ✓ Systematically share relevant information about personnel known to have committed sexual harassment, exploitation or abuse with other potential employers during due diligence, to the extent permitted by law.

Annex 4. Safeguarding Risk Assessment

In order to comply with this Policy, the CO “CF “ADRA Ukraine” shall carry out due diligence to identify, reduce and monitor the risks of security-related incidents. Security risk assessments and mitigation plans can be incorporated into existing risk assessment or management procedures, such as security risk registers or security analysis.

Operational level: The CO “CF “ADRA Ukraine” should conduct an annual risk assessment that identifies organisational risks of harm, in particular in administrative areas (e.g. personnel, information technology) that are not necessarily related to individual projects.

Project level: Within programme approaches, programme teams should assess the level of risk of negative outcomes and adapt programme design and implement prevention strategies accordingly. This is especially important in the context of humanitarian response.

Implementation partners: When selecting partners, the ability of the potential partner to comply with the Safeguarding Policy of the CO “CF “ADRA Ukraine” should be taken into account. The level of this assessment should correspond to the degree of involvement of the partner in working with beneficiaries. The results of the assessment should be reflected in the contract and work plan between the CO “CF “ADRA Ukraine” and the partner to strengthen the latter’s capacity.

Decision-making processes and documentation should reflect these assessments. At the same time, it does not have to be a separate procedure — it should be integrated into the existing business planning and risk management processes.

Acknowledgement form

I hereby confirm that I have read, understood, and agree to comply with the Safeguarding Policy of CO “CF “ADRA Ukraine” throughout the entire period of my employment, cooperation, or representation of CO “CF “ADRA Ukraine”.

I understand that any violation of the Safeguarding Policy, depending on the severity, may result in immediate disciplinary action, including termination of employment or partnership.

I acknowledge that during the recruitment process, as well as on a regular basis, CO “CF “ADRA Ukraine” may screen my name through relevant routine vetting mechanisms.

I commit to reporting, through appropriate channels, any incidents that contravene the standards outlined in this Policy.

(Signature)

(Date)

ПРОТОКОЛ № 1
НАГЛЯДОВОЇ РАДИ
БЛАГОДІЙНОЇ ОРГАНІЗАЦІЇ «БЛАГОДІЙНИЙ ФОНД «АДВЕНТИСТСЬКЕ
АГЕНТСТВО ДОПОМОГИ ТА РОЗВИТКУ В УКРАЇНІ»

м. Київ, вул. Лук'янівська, 9/10А

«05» червня 2025 року

11:00 за Київським часом

Присутні:

- Кривой Віталій Вікторович, голова Наглядової Ради (головуючий на засіданні);
- Велечук Володимир Стефанович, член Наглядової ради;
- Проданюк Роман Олексійович, член Наглядової ради;
- Бойко Микола Олексійович, член Наглядової ради;
- Лавренюк Василь Іванович, член Наглядової ради;
- Зайцев Олександр Анатолійович, член Наглядової ради;
- Самойленко Віктор Володимирович, член Наглядової ради;
- Вертило Лев Пантелійович, член Наглядової ради;
- Ващінін Олександр Іванович, член Наглядової ради;
- Поправкін Дмитро Миколайович, член Наглядової ради;
- Чопик Василь Юрійович, член Наглядової ради;
- Бондаренко Юрій Олександрович, член Наглядової ради;
- Кампен Костянтин Степанович, член Наглядової ради;
- Шевчук Андрій Васильович, член Наглядової ради;
- Крупський Максим Володимирович, член Наглядової ради.

Запрошені: Леонід Рутковський, президент БО «БФ «АДРА УКРАЇНА».

ВІДКРИТТЯ ЗАСІДАННЯ

Надійшла пропозиція розпочати засідання.

На засіданні присутні 15 (п'ятнадцять) із 15 членів Наглядової ради. Кворум наявний.

Віталій Кривой оголосив присутніх на засіданні та запрошених.

Віталій Кривой оголосив перелік питань проекту порядку денного:

1. Про обрання секретаря засідання Наглядової ради.
2. Про затвердження Політики захисту даних.
3. Про затвердження Політики з питань забезпечення.
4. Про затвердження Політики щодо розкриття інформації.
5. Про затвердження Політики щодо запобігання корупції та шахрайським діям.
6. Про затвердження Положення щодо визначення та вирішення конфлікту інтересів.
7. Про затвердження Політики щодо медіа та комунікацій.

ВИРІШИЛИ:

Прийняти порядок денний за основу.

ГОЛОСУВАННЯ:

За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

Обговорення питань порядку денного

1. Про обрання секретаря засідання Наглядової ради.

СЛУХАЛИ: Віталія Кривого, який запропонував обрати секретарем засідання Наглядової ради Олександра Ващініна.

ВИРІШИЛИ: Обрати секретарем засідання Наглядової ради - Олександра Ващініна.

ГОЛОСУВАННЯ:

За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

2. Про затвердження Політики захисту даних.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику захисту даних в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику захисту даних в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:

За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

3. Про затвердження Політики з питань забезпечення.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику з питань забезпечення в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику з питань забезпечення БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:

За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

4. Про затвердження Політики щодо розкриття інформації.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику щодо розкриття інформації в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику щодо розкриття інформації в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:

За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

5. Про затвердження Політики щодо запобігання корупції та шахрайським діям.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику щодо запобігання корупції та шахрайським діям в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику щодо запобігання корупції та шахрайським діям в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:

За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

6. Про затвердження Положення щодо визначення та вирішення конфлікту інтересів.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Положення щодо визначення та вирішення конфлікту інтересів в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Положення щодо визначення та вирішення конфлікту інтересів в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:

За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

Голова Наглядової ради закрив засідання.

Додатки:

1. Політика захисту даних.
2. Політика з питань убезпечення.
3. Політика щодо розкриття інформації.
4. Політика щодо запобігання корупції та шахрайським діям.
5. Положення щодо визначення та вирішення конфлікту інтересів.

Голова Наглядової ради

Секретар Наглядової ради



Віталій КРИВОЙ

Олександр ВАЩІНІН